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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY and STATE FARM ) FIRE AND CASUALTY COMPANY,

Plaintiffs,

PETER J. HANSON, P.C. D/B/A HANSON CHIROPRACTIC and PETER J. HANSON,

Defendants.

NO. 16-cv-01085-RSL

STIPULATED MOTION TO EXTEND CERTAIN PRETRIAL DEADLINES

Honorable Robert S. Lasnik

NOTE ON MOTION CALENDAR: August 9, 2017

## STIPULATED MOTION TO EXTEND CERTAIN PRETRIAL DEADLINES

Pursuant to the Court's August 30, 2016 Amended Minute Order Setting Trial Date & Related Dates (ECF No. 14), Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company ("State Farm Plaintiffs") and Defendants Peter J. Hanson, P.C. d/b/a Hanson Chiropractic and Peter J. Hanson ("Hanson Defendants") stipulate and agree to, and request the Court to approve, the following proposal for certain remaining pretrial deadlines, with no change to the dispositive motion or trial dates. The parties make this request to allow them to mediate and potentially resolve this matter before conducting corporate representative and expert depositions. The parties are scheduled to mediate on September 21, 2017.

STIPULATED MOTION TO EXTEND CERTAIN PRETRIAL **DEADLINES - 1** Case No. 16-cv-01085-RSL

MERRICK, HOFSTEDT & LINDSEY, P.S. ATTORNEYS AT LAW 3101 WESTERN AVENUE, SUITE 200 SEATTLE, WASHINGTON 98121 (208) 682-0610

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1	The parties propose the following:	
2	TRIAL DATE	January 8, 2018 Unchanged
3 4	Defendant's Rebuttal Expert Report due no later than	September 1, 2017
5		New
6	All motions related to discovery must be noted on the motion calendar no later than the Friday before discovery closes pursuant to LCR 7(d) or LCR 37(a)(2)	Unchanged
7		
8	Discovery completed by	September 10, 2017 Unchanged
9	Corporate Representative and Expert Depositions to be completed	September 25-October
10		6, 2017 New
11	Settlement conference held no later than	September 24, 2017
12		Unchanged
13	All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d)(3))	October 10, 2017
14 15		Unchanged
16	All motions in limine must be filed by and noted on the motion calendar no earlier than the second Friday thereafter.	December 11, 2017 Unchanged
17	Replies will be accepted.	
18	Agreed pretrial order due	December 27, 2017
19		Unchanged
20	Pretrial conference to be scheduled by the Court	
21	Trial briefs, proposed voir dire questions, proposed jury instructions, and trial exhibits due	January 3, 2018
22		Unchanged
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STIPULATED MOTION TO EXTEND CERTAIN PRETRIAL **DEADLINES - 2** 

Case No. 16-cv-01085-RSL

MERRICK, HOFSTEDT & LINDSEY, P.S. ATTORNEYS AT LAW
3101 WESTERN AVENUE, SUITE 200
SEATTLE, WASHINGTON 98121
(208) 682-0610

 ${\tt L.\backslash 180336-STATE\ FARM\ V.\ PETER\ HANSON PLEADINGS STIPULATED\ MOTION\ TO\ EXTEND\ PRETRIAL\ DEADLINES\_$ 

## 1 RESPECTFULLY SUBMITTED this 9th day of August, 2017 2 MERRICK, HOFSTEDT & LINDSEY, P.S. CORR CRONIN MICHELSON BAUMGARDNER FOGG & MOORE LLP 3 By /s/ Peter Steilberg By /s/ Steven W. Fogg Peter Steilberg, WSBA #22190 Steven W. Fogg, WSBA #23528 4 Tamara K. Nelson, WSBA #27679 Todd T. Williams, WSBA #45032 3101 Western Avenue, Suite 200 1001 Fourth Avenue, Suite 3900 5 Seattle, WA 98121 Seattle, WA 98154 6 Telephone: (206) 682-0610 Telephone: (206) 625-8600 Facsimile: (206) 467-2689 Facsimile: (206) 625-0900 7 psteilberg@mhlseattle.com sfogg@corrcronin.com tnelson@mhlseattle.com twilliams@correronin.com 8 LEE SMART, P.S., INC. AKERMAN LLP 9 10 By /s/ Gregory P. Turner By /s/ David I. Spector Gregory P. Turner, WSBA #20085 David I. Spector, Pro Hac Vice 11 gpt@leesmart.com S. Montaye Sigmon, Pro Hac Vice 701 Pike Street, Suite 1800 Kayla L. Pragid, Pro Hac Vice 12 Seattle, WA 98101 777 S. Flagler Drive, West Tower, Suite 1100 Telephone: (206) 624-7990 West Palm Beach, FL 33401 13 Telephone: (206) 624-5944 Facsimile: (561) 653-5000 14 BARATTA, RUSSELL & BARATTA Facsimile: (561) 659-6313 David.spector@akerman.com 15 By /s/ Andrew P. Baratta Kayla.pragid@akerman.com Andrew P. Baratta, Pro Hac Vice 16 Andrew@barattarussell.com Attorneys for Plaintiffs 3500 Reading Way 17 Huntingdon Valley, PA 19006 18 Telephone: (215)-914-2222 19 Attorneys for Defendants 20 21 22 23

STIPULATED MOTION TO EXTEND CERTAIN PRETRIAL DEADLINES - 3
Case No. 16-cy-01085-RSL

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MERRICK, HOFSTEDT & LINDSEY, P.S. ATTORNEYS AT LAW 3101 WESTERN AVENUE, SUITE 200 SEATTLE, WASHINGTON 98121 (208) 882-0810 

## (PROPOSED) ORDER

Based on the foregoing Stipulated Motion, the Amended Minute Order Setting Trial

Dates & Related Dates (ECF No. 14) is amended as set forth in the above schedule.

DATED this 16 day of August, 2017.

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The Honorable Robert, Lasnik United States District Court Judge

STIPULATED MOTION TO EXTEND CERTAIN PRETRIAL DEADLINES - 4
Case No. 16-cv-01085-RSL

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LA180336 - STATE FARM V. PETER HANSONPLEADINGSSTIPULATED MOTION TO EXTEND PRETRIAL DEADLINES